

THE HONORABLE RICARDO S. MARTINEZ

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

ANN JOHNSON, AS THE  
REPRESENTATIVE OF A CLASS OF  
SIMILARLY SITUATED PERSONS, AND  
ON BEHALF OF THE ROYAL  
CARIBBEAN CRUISES LTD.  
RETIREMENT SAVINGS PLAN,

Plaintiff,

v.

RUSSELL INVESTMENTS TRUST  
COMPANY (F/K/A RUSSELL TRUST  
COMPANY), ROYAL CARIBBEAN  
CRUISES LTD., AND ROYAL  
CARIBBEAN CRUISES LTD.  
INVESTMENT COMMITTEE

Defendants.

Case No.: 2:21-cv-00743-RSM

**STIPULATION AND ORDER  
REGARDING AMENDED COMPLAINT  
AND INITIAL SCHEDULING DATES**

NOTE ON MOTION CALENDAR:  
September 20, 2021

Plaintiff Ann Johnson, as representative of a class of similarly situated persons, and on behalf of the Royal Caribbean Cruises Ltd. Retirement Savings Plan, and Defendants Russell Investments Trust Company ("RITC"), Royal Caribbean Cruises Ltd. ("Royal Caribbean"), and the Royal Caribbean Cruises Ltd. Investment Committee ("Investment Committee") (collectively, the "Parties"), by and through their undersigned counsel and

STIPULATION AND ORDER REGARDING AMENDED COMPLAINT  
AND SCHEDULING DATES - 1  
CASE NO. C21-743RSM

**NICHOLS KASTER PLLP**  
80 South Eighth Street, Ste. 4700  
Minneapolis, MN 55402

1 subject to the approval of the Court, hereby stipulate and agree as follows:

2 WHEREAS, Plaintiff and former Defendant Russell Investment Management LLC  
3 previously stipulated and agreed that Plaintiff would file an amended complaint on or before  
4 August 30, 2021 and that the deadline to answer or otherwise respond to the amended complaint  
5 would be September 30, 2021 (ECF No. 28);

6 WHEREAS, the Court approved the prior stipulation in an Order dated July 29, 2021 (ECF  
7 No. 29);

8 WHEREAS, Plaintiff filed her First Amended Complaint on August 30, 2021 (ECF No.  
9 31);

10 WHEREAS, the First Amended Complaint substituted RITC for Russell Investment  
11 Management LLC, and additionally named Royal Caribbean and the Investment Committee as  
12 Defendants;

13 WHEREAS, the undersigned counsel for RITC has agreed to accept service on behalf of  
14 RITC;<sup>1</sup>

15 WHEREAS, the undersigned counsel for Royal Caribbean and the Investment Committee  
16 (the “Royal Caribbean Defendants”) has agreed to accept service on behalf of the Royal Caribbean  
17 Defendants;

18 WHEREAS, the Royal Caribbean Defendants request additional time to respond to the  
19 First Amended Complaint, as the newly added Defendants need additional time to adequately  
20 analyze and evaluate the factual and legal allegations in the 83-paragraph pleading;

21 WHEREAS, the Parties have agreed that the Royal Caribbean Defendants may have until  
22 November 1, 2021 to respond to the Amended Complaint;

23 WHEREAS, the Parties have further agreed that the same deadline shall apply to RITC and  
24 that RITC also may have until November 1, 2021 to respond to the Amended Complaint;

25 \_\_\_\_\_  
26 <sup>1</sup> RITC’s undersigned counsel also served as counsel for former Defendant Russell Investment Management LLC.

WHEREAS, the Court's Order dated July 29, 2021 states that "the parties named in the amended complaint shall provide the Court with revised proposed Initial Scheduling Dates, addressing the deadlines for the FRCP 26(f) Conference, Initial Disclosures, and Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Rule CR 16, within 10 days of service of the amended complaint on all defendants"; and

WHEREAS, the Parties have met and conferred regarding these Initial Scheduling Dates, and have reached agreement on the deadlines referenced in the Court's Order;

IT IS HEREBY STIPULATED AND AGREED by and between the Parties, subject to the approval of the Court, that (1) the undersigned counsel for RITC accepts service of the Amended Complaint on behalf of RITC and in so doing waives the need for formal service of process but reserves all other defenses and arguments that RITC may have with respect to the Amended Complaint; (2) the undersigned counsel for the Royal Caribbean Defendants accepts service of the Amended Complaint on behalf of the Royal Caribbean Defendants, and in so doing waives the need for formal service of process but reserves all other defenses and arguments that the Royal Caribbean Defendants may have with respect to the Amended Complaint; (3) the deadline for all Defendants to answer or otherwise respond to the Amended Complaint shall be November 1, 2021; (4) the deadline for the Parties to hold the FRCP 26(f) conference shall be November 15, 2021; (5) the deadline for the Parties to serve Initial Disclosures pursuant to FRCP 26(a)(1) shall be November 22, 2021; and (6) the deadline for the Parties to submit a Combined Joint Status Report and Discovery Plan pursuant to FRCP 26(f) and Local Rule CR 16 shall be December 1, 2021.

IT IS SO STIPULATED this 20th day of September, 2021.

**PERKINS COIE LLP**

**SCHROETER GOLDMARK & BENDER, P.S.**

By s/ Nicola C. Menaldo

By s/ Lindsay L. Halm

Karl J. Ege, Esq., WSBA #4796

Lindsay L. Halm, Esq., WSBA #37141

Nicola C. Menaldo, Esq., WSBA #44459

401 Union Street, Suite 3400

1201 Third Avenue, Suite 4900

Seattle, Washington 98101

STIPULATION AND ORDER REGARDING AMENDED COMPLAINT  
AND SCHEDULING DATES - 3  
CASE NO. C21-743RSM

**NICHOLS KASTER PLLP**  
80 South Eighth Street, Ste. 4700  
Minneapolis, MN 55402

1 Seattle, Washington 98101  
2 Telephone: (206) 359-8000  
3 kege@perkinscoie.com  
4 nmenaldo@perkinscoie.com

5 **MILBANK LLP**

6 Sean M. Murphy, Esq.\*  
7 Robert C. Hora, Esq.\*  
8 Vanessa Gonzalez-Ahmed, Esq.\*  
9 Maria Esperanza Ortiz, Esq.\*  
10 \*admitted pro hac vice  
11 55 Hudson Yards  
12 New York, NY 10001  
13 Telephone: 212-530-5688  
14 smurphy@milbank.com  
15 rhora@milbank.com  
16 vgonzalez-ahmed@milbank.com  
17 mortiz@milbank.com

18 *Attorneys for Defendant*  
19 *Russell Investments Trust Company*

20 **BARLOW COUGHRAN MORALES &**  
21 **JOSEPHSON, P.S.**

22 By s/ Jeffrey G. Maxwell  
23 Jeffrey G. Maxwell, Esq., WBSA# 33503  
24 1325 Fourth Avenue  
25 Suite 910  
26 Seattle WA 98101  
Telephone: (206) 674-5212  
jeffreym@bcmjlaw.com

**GROOM LAW GROUP, CHARTERED**

Lars C. Golumbic, Esq. (*pro hac vice*  
forthcoming)  
Samuel I. Levin, Esq. (*pro hac vice*  
forthcoming)

Telephone: (206) 622-8000  
halm@sgb-law.com

**NICHOLS KASTER, PLLP**

Paul J. Lukas, MN Bar No. 22084X\*  
Kai H. Richter, MN Bar No. 0296545\*  
Brock J. Specht, MN Bar No. 0388343\*  
Ben Bauer, MN Bar No. 0398853\*  
\*admitted pro hac vice  
4700 IDS Center  
80 S 8th Street  
Minneapolis, MN 55402  
Telephone: 612-256-3200  
Facsimile: 612-338-4878  
lukas@nka.com  
krichter@nka.com  
bspecht@nka.com  
bbauer@nka.com

*Attorneys for Plaintiff Ann Johnson*

1 Nathaniel W. Ingraham, Esq. (*pro hac vice*  
forthcoming)

2 1701 Pennsylvania Ave., NW  
Suite 1200

3 Washington, DC 20006

4 Telephone: 202-861-6615

5 lgolumbic@groom.com

slevin@groom.com

ningraham@groom.com

6 *Attorneys for Defendants Royal Caribbean*  
7 *Cruises Ltd. and Royal Caribbean Cruises*  
8 *Ltd. Investment Committee*

**ORDER**

Based on the foregoing stipulation of the parties, IT IS HEREBY ORDERED that Defendants shall answer or otherwise respond to the First Amended Complaint on or before November 1, 2021.

IT IS FURTHER ORDERED that the deadline for the Parties to hold the FRCP 26(f) conference shall be November 15, 2021; the deadline for the Parties to serve Initial Disclosures pursuant to FRCP 26(a)(1) shall be November 22, 2021; and the deadline for the Parties to submit a Combined Joint Status Report and Discovery Plan pursuant to FRCP 26(f) and Local Rule CR 16 shall be December 1, 2021.

DATED this 21<sup>st</sup> day of September, 2021.



RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

s/ Lindsay L. Halm

Lindsay L. Halm, Esq., WSBA #37141

**SCHROETER GOLDMARK & BENDER, P.S.**

401 Union Street, Suite 3400

Seattle, Washington 98101

Telephone: (206) 622-8000

halm@sgb-law.com

*Attorney for Plaintiff Ann Johnson*

STIPULATION AND ORDER REGARDING AMENDED COMPLAINT  
AND SCHEDULING DATES - 6  
CASE NO. C21-743RSM

**NICHOLS KASTER PLLP**  
80 South Eighth Street, Ste. 4700  
Minneapolis, MN 55402